

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

OSCAR YANES, GAGIK MKRTCHIAN,
and **WENDELL RAFAEL BAEZ LOPEZ,**
on behalf of themselves and all those
similarly situated,

Petitioners-Plaintiffs,

v.

CHAD WOLF, Acting Secretary, U.S.
Department of Homeland Security;
MATTHEW T. ALBENCE, Acting
Director, U.S. Immigration and Customs
Enforcement; **TODD LYONS**, Acting
Field Office Director, U.S. Immigration and
Customs Enforcement; **DANIEL W.**
MARTIN, Warden, Donald W. Wyatt
Detention Facility; and **CENTRAL**
FALLS DETENTION FACILITY
CORPORATION,

Respondents-Defendants.

Civil Action No. 1:20-cv-00216

**SUPPLEMENT TO BAIL REQUEST OF
ELADIO PUIG MEDINA**

In advance of Mr. Eladio Puig Medina's bail hearing on June 26, 2020, Petitioners-Plaintiffs hereby submit the attached Supplemental Declaration of Nick Horton, Co-Executive Director of OpenDoors. As an alternative to residing with his mother, Mr. Puig Medina is willing to be housed through the OpenDoors Program if released. OpenDoors operates a 14-unit housing facility at 700 Plainfield Street, Providence, Rhode Island, and provides structured, transitional housing for formerly incarcerated individuals. *See* Supplemental Declaration of Nick Horton, at ¶¶ 1–2. OpenDoors can provide support and additional monitoring of conditions upon Mr. Puig

Medina's release, including conducting random drug screenings and facilitating his participation in a substance abuse treatment program. *Id.* ¶¶ 12–14, 19–21. OpenDoors is also equipped to handle Spanish-speaking tenants. *Id.* ¶ 16.

Mr. Puig Medina is committed to attending a drug treatment program as part of his release, whether facilitated through OpenDoors or while staying with his family.

Dated: June 25, 2020

Respectfully Submitted,

/s/ Lindsey Kaley

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CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2020, I electronically filed the foregoing document with the United States District Court for the District of Rhode Island by using the CM/ECF system. I certify that the parties or their counsel of record registered as ECF Filers will be served by the CM/ECF system, and paper copies will be sent to those indicated as non-registered participants, if any.

/s/ Lindsey Kaley

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